

## Remarks

The present response is to the Office Action mailed in the above referenced case on May 04, 2005, made final. Claims 1-16 are presented below for examination. Claims 1, 2, 5-11 and 14-16 are rejected under 35 U.S.C. 102(e) as being anticipated by Zollinger et al. (U.S. 5,999,947), hereinafter Zollinger. Claims 3, 4, 12 and 13 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Zollinger, in view of Wu (U.S. 6,463,947), hereinafter Wu.

Applicant has carefully studied the prior art references provided by the Examiner, the Examiner's rejections and statements of the instant Office Action, the Examiners response to arguments and the claims in the instant application as originally filed. In response, applicant herein amends the independent claims to more particularly recite that a unique identifier exists for each separate data record stored at the server and the client in their respective tables.

According to the teachings of Zollinger, originally, the server and client have tables of the same version. Meanwhile, the server periodically updates its stored tables and uniquely identifies the tables with version identifiers, which are sequentially assigned to the stored tables as periodic updates are performed on the tables. When the client contacts the server with the synchronization request, the server determines the table version(s) of the client (step 102) and the server then compares the client table version with the updated table version stored, and calculates the difference updates (step 106), the differences are translated from the generic format to database engine instructions according to the client computer's database engine (step 108), and the instructions along with the current table version are then transmitted to the client computer for making the database table current.

It is important to note that in the invention of Zollinger, it is the tables which are updated, identified by version numbers, etc., and stored, which the server compares to the client table version detected.

Applicant argues that the art of Zollinger teaches the updates cannot be read and

translated as only differences, and the unique identifiers of the tables of Zollinger, therefore, cannot be equated to the unique identifiers of the separate data records of applicant's invention. Zollinger teaches that version numbers are given to tables containing data records (Fig. 6, col. 11, line 65 to col. 12, line 9).

When Zollinger encounters a synchronization request from a client presenting a table with a version number differing from the table version currently stored at the server, all of the data records in each table belonging to the client and server must be processed in their entirety to determine differences indicating updated records. In applicant's invention, as claimed, only the identifiers are compared, and when differences occur in the identifiers, the entire data record is accessed from storage and sent to the client. In this manner bandwidth and resident memory are being conserved on both the server and client side.

The key and important difference is that the compared tables of applicant's invention are tables of identifiers, whereas the tables of Zollinger are tables of data elements, and it is the tables which are uniquely identified in Zollinger, not the separate data elements themselves, as in applicant's invention. The comparison performed in applicant's invention is between the unique identifiers of the client data elements and the server data elements, and does not compare the versions of the client and server tables of data elements as in Zollinger.

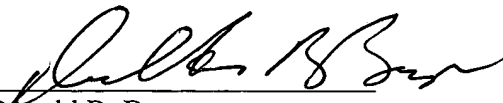
Applicant believes independent claims 1 and 9, as amended, are clearly patentable over the art of Zollinger. The Examiner has rejected claims 3, 4, 12 and 13 as being unpatentable over Zollinger in view of Wu. The Examiner has relied on the reference of Wu for teaching the well-known aspect of the cyclic redundancy check (CRC) function. The claims are all independent claims, and as Zollinger is clearly an improper primary reference as argued above by applicant on behalf of the independent claims, the combined references fail to teach, suggest or intimate all of the limitations of applicant's claims. Depending claims 2-8 and 10-16 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims standing for examination have been shown to be patentable over the art of record, applicant respectfully requests reconsideration, and that the present

- 7 -

case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this response, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,  
Sin-Mei Tsai et al.

by   
Donald R. Boys  
Reg. No. 35,074

Central Coast Patent Agency  
P.O. Box 187  
Aromas, CA 95004  
(831) 726-1457